# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

UNITED STATES OF AMERICA	§ §	
v.	§	No. 4:19CR159
	§	Judge Jordan
EDUARDO LEON (1)	§	
JAZLYN MAGALY SCOTT (2)	§	
RALPHIE LOPEZ (3)	§	
ANTHONY NORMAN MORSE (4)	§	275.17
CATHERINE VEGA (5)	§	
DANIEL MARTINEZ (6)	§	
PEDRO MARTINEZ TORRES (7)	§	5 4 0 = 2020
VICENTE ESTRADA YANEZ (8)	§	JAN 8 - 2020
TOMMY RAY BUTLER (9)	§	Clerk, U.S. District Court
RICARDO RUIZ RODRIGUEZ (10)	§	Texas Eastern
a.k.a. "Saturnino Volanos-Rangel	§	
ISMAEL BERMUDEZ-SOSA (11)	§	
HECTOR PACHECO-RODRIGUEZ (12)	§	
OMAR MARTINEZ-ALCARAZ (13)	§	
JORGE AMERICO NEGRETE (14)	§	
ALEXANDRO JAVIER LARA (15)	§	
a.k.a. "El Dueno"	§	

#### THIRD SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

### **Count One**

Violation: 21 U.S.C. § 846 (Conspiracy to Possess with the Intent to Distribute Cocaine)

That from sometime in or about January 2017, and continuously thereafter up to and including January 8, 2020, in the Eastern District of Texas, and elsewhere,

Eduardo Leon Jazlyn Magaly Scott Ralphie Lopez
Anthony Norman Morse
Catherine Vega
Daniel Martinez
Pedro Martinez Torres
Ricardo Ruiz Rodriguez, a.k.a. "Saturnino Volanos-Rangel"
Ismael Bermudez-Sosa
Hector Pacheco-Rodriguez
Omar Martinez-Alcaraz
Jorge Americo Negrete
Vicente Estrada Yanez
Tommy Ray Butler
Alexandro Javier Lara, a.k.a. "El Dueno"

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to manufacture and distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

#### **Count Two**

Violation: 21 U.S.C. § 846 (Conspiracy to Possess with the Intent to Distribute Heroin)

That from sometime in or about January 2017, and continuously thereafter up to and including January 8, 2020, in the Eastern District of Texas, and elsewhere,

Eduardo Leon
Jazlyn Magaly Scott
Ralphie Lopez
Anthony Norman Morse
Catherine Vega
Daniel Martinez

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to manufacture and distribute 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

## NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

As a result of committing the offense charged in this Third Superseding

Indictment, the defendants shall forfeit to the United States, pursuant to 21 U.S.C. § 853,
all property used to commit or facilitate the offenses, proceeds from the offenses, and
property derived from proceeds obtained directly or indirectly from the offenses,
including but not limited to the following:

All such proceeds and/or instrumentalities are subject to forfeiture by the government.

A TRUE BILL

GRAND JURY FOREPERSON

1/8/2020

JOSEPH D. BROWN

UNITED STATES ATTORNEY

ERNEST GONZALEZ

Assistant United States Attorney

Date

Third Superseding Indictment/Notice of Penalty - Page 3

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## **Count One**

<u>Violation</u>: 21 U.S.C. § 846

<u>Penalty</u>: If 5 kilograms or more of a mixture or substance containing a detectable amount

of cocaine – not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least five

years

Special Assessment: \$100.00

### **Count Two**

<u>Violation</u>: 21 U.S.C. § 846

<u>Penalty</u>: If 1 kilogram or more of a mixture or substance containing a detectable amount of

heroin – not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least five years

Special Assessment: \$100.00